

**Seattle's Shorelines Today and Tomorrow:
Updating Seattle's Shoreline Master Program**
Citizens Advisory Committee Discussion on Shoreline Environmental Designations
Tuesday, August 26, 2008

At its August 2008 meeting, the Seattle Shoreline Master Program (SMP) Citizens Advisory Committee (Committee) received a presentation from the Seattle Department of Planning and Development (DPD) on the changes to shoreline environmental designations that DPD is proposing as part of its SMP update. The Committee then discussed the proposed changes, with individual members asking questions and providing feedback. That feedback is captured below, alongside responses to questions provided by DPD (in parentheses). Feedback provided via email by a member who could not attend the meeting is also captured below.

The Committee intends to use this document as a record of its discussion and a starting point for recommendations when it crafts a report toward the end of the Committee process. *It is important to note that the feedback provided below represents the current opinion of individual members. It does not necessarily represent consensus positions among the Committee as a whole, and is subject to change as the process develops.*

- Why are parks such as Greenlake designated Conservancy Management while others are designated Conservancy Recreation? An alternative would be to change the allowable uses in Conservancy Recreation to allow boat ramps. Does Seattle Parks and Recreation have to follow SMP guidelines? (Yes)
- It would be useful if DPD could provide a matrix showing what uses are allowed under current environmental designations, to help Committee members understand the consequences of an area changing from one designation to another. (DPD will provide such a matrix).
- Combining aquatic environments with non-aquatic environments in one designation is confusing. Consider separate designations for each environment. (DPD and other Committee members replied that it can be as or more confusing to manage a property that contains multiple designations).
- The Urban Industrial designation seems too broad and oversimplified, particularly in the Duwamish.
- We have an opportunity in this update to make large-scale revisions. DPD should not be timid about making changes. (DPD is looking at the code very comprehensively during this update process and plans to make all appropriate changes. Specific and broad recommendations about changes to the code are welcome.)
- DPD has done a thoughtful job at cleaning up inconsistencies. But we also have an opportunity to look into the future in regards to areas that are developing and progressing away from their historical designations, for example the Lake Union area.

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- DPD wants the new environmental designations to be compatible with the existing zones however the underlying zone is not the driver in this process.
- In crafting its vision for the future of Seattle's shorelines, the Committee emphasized the importance of maintaining historic uses. Two changes are being proposed that are not compatible with this: 1) changing the designation of dry and submerged lands at Shilshole Bay Marina from Urban Stable to Conservancy Management for consistency with other marinas; and 2) Changing the designation from Urban Stable to Urban Residential and the underlying zoning to single-family residential in the predominantly residential area along North Salmon Bay. (Regarding both proposed changes DPD looked at two land use inventories [one from 1987 and a recently produced one] and at existing trends and conditions, as well as having the Seattle Office of Economic Development assist in figuring out current and likely future economic uses. In some areas, it is difficult to predict what the demand is for zoning and uses. Regarding the later proposed change: the underlying zone is commercial and the current shoreline zone is US, which requires a commercial use on the ground floor; however, the predominant use of this area is still residential so it appears, based on existing uses, that commercial development is not occurring in this area and may not be appropriate.)
- The Port of Seattle is seriously concerned with the proposed redesignation of Shilshole Bay Marina. It seems in conflict with the underlying uses and zoning.
- The varying terms used to describe obligations related to ecological function and ecosystems in the Protection/Prevention/Restoration Standards are somewhat confusing. For example, the terms "minimize," "avoid," "prevent," "protect" and "maintain" are all used to describe obligations throughout the document; however, it is unclear what kinds of actions meet the different criteria. I would like to see a more complete description of what is meant by the different terms and the differences in the obligations they imply.
- The same question exists with respect to the use of the terms "substantially" and "significant" concerning the kinds of potential shoreline impacts. For example, Conservancy Preservation's management policies include preventing uses that "substantially" degrade ecological functions, while Conservancy Recreation's standard is "where significant ecological impacts can be mitigated." A more clear description of the different standards would be helpful.
- More explicitly include "riparian areas" within all the environmental designations that discuss public access, beach protection, views and the like, as "shoreline" often does not suggest "riparian areas" to readers.
- Conservancy Navigation Environment, Management Policy #4 lists "prevent degradation of water quality and alteration of hydrology" as a policy. Would it be possible to include this Management Policy under all of the Environmental Designations, given that water quality is

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key to ecosystem health and No Net Loss? "Prevent" may be too strong a word to use under all of the designations, but if we could get water quality incorporated into the Management Policies for all designations in some way, it could be helpful for guiding shoreline management and pushing the City to more effectively deal with water quality across the City.

- Could the same approach also be taken with respect to restoration and improvement of ecological function? Improvement of ecological function should always be a management policy, with the understanding that it will have greater or lesser priority within different environmental designations.
- The following goal, which appears in several of the designations, is confusing: "Where applicable"... development shall include clean up and restoration required by law. If the law requires clean up and restoration, then it wouldn't seem necessary to include the sentence. What is the intention with this sentence? There is also a mention in several designations of requiring restoration only "where feasible." How is "where feasible" determined? The first statement is a requirement of the WAC and specifically calls out required by State or Federal laws. This statement can provide policy guidance that would then lead to SMP regulations that help facilitate easy permitting of such projects. Feasible will need to be defined.
- Several of the designations specifically mention "no net loss of ecological function." However, as has been discussed, "no net loss" is a cumulative measurement that needs to be taken across the entire shoreline, incorporating all shoreline uses. Having "no net loss" mentioned only within specific environmental designations, rather than as an overarching management policy that transcends all environmental designations may lead to a narrow interpretation of how "no net loss" should be measured.
- There may be a typo on the shoreline designation map – Urban Stable is still listed, while Urban Mixed is not mentioned.